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March 9, 2022

**BY ECF**

Hon. Laura Taylor Swain  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

**Re: United States v. Constantinescu, et al., 19 CR 651 (LTS)**

Dear Judge Swain:

I am writing on behalf of defendant Theofrastos Lymberatos to respectfully request a modification of the defendant's conditions of release which would permit him to travel to East Rutherford, New Jersey on March 20 in order to take his son to the Mall of America prior to beginning service of his prison sentence. Pretrial Services does not object to this application and the government, by AUSA Robert Sobelman, defers to their position.

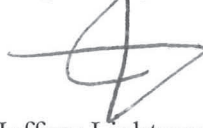
By way of background, Judge Wang released the defendant on October 10, 2019 pursuant to a \$250,000 personal recognizance bond secured by two financially responsible persons and \$250,000 in property, with travel limited to the Southern and Eastern Districts of New York, and additional conditions including home detention and GPS location monitoring. On January 12, 2022, Your Honor sentenced Mr. Lymberatos to a term of imprisonment of 47 months, for which he will surrender to the BOP and begin service on April 28, 2022.

JEFFREY LICHTMAN

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Thank you for the Court's consideration of this application. I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'J. Lichtman', with a stylized, overlapping loop.

Jeffrey Lichtman

cc: All counsel (by ecf)  
Pretrial Services (by email)

The requested modification is granted. DE# 1023 resolved.  
SO ORDERED:

/s/ Laura Taylor Swain 3/9/2022  
HON. LAURA TAYLOR SWAIN, U.S.D.J.